

EXHIBIT 3

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QUICKEN LOANS INC.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

15 AMANDA HILL, individually and on
16 behalf of all others similarly situated,

16 Plaintiff,

V.

16 QUICKEN LOANS INC.

Defendant.

Case No. 5:19-cv-00163-FMO-SP

**DECLARATION OF PARUL
LUTHRA IN SUPPORT OF
QUICKEN LOANS INC.'S MOTION
TO COMPEL ARBITRATION**

Date: May 16, 2019
Time: 10:00 a.m.
Courtroom: 6D
Judge: Hon. Fernando M. Olguin
350 W. 1st Street, 6th Floor,
Los Angeles, CA 90012

Filed concurrently with:

1. Notice of Motion;
2. Memorandum;
3. Declaration of W. Kyle Tayman;
4. Declaration of Mitchell Viner; and
5. Proposed Order

1 DECLARATION OF PARUL LUTHRA

2 I, Parul Luthra, hereby declare and state as follows:

3 1. I am currently a Team Leader at Quicken Loans Inc. ("Quicken
4 Loans"). Until July 16, 2018, I was a Senior Data Analyst.

5 2. I have been employed by Quicken Loans as a Senior Data Analyst and
6 then a Team Leader since September 19, 2012. In that role I have had various duties
7 and responsibilities relating to reviewing, analyzing, collecting, and identifying call
8 and text records, call recordings, and other data maintained in the ordinary course of
9 business in Quicken Loans' systems of record about calls to clients.

10 3. As part of Quicken Loans' business model, its team members contact
11 individuals who have expressed an interest in obtaining a mortgage loan and who
12 have consented to being contacted about mortgage services. While some individuals
13 visit QuickLoans.com or call the company's direct line, others visit and provide
14 consent to be contacted through third party websites, such as those run or powered
15 by LMB Mortgage Services, Inc. d/b/a LowerMyBills.com ("LMB")—a company
16 related to and associated with Quicken Loans.

17 4. From my review of the First Amended Complaint in this case, I
18 understand that Plaintiff Amanda Hill ("Hill") alleges that Quicken Loans sent text
19 messages to her cellular telephone number ending in "9785."

20 5. As a result of my duties and responsibilities at Quicken Loans, I have
21 personal knowledge about Quicken Loans' records (electronic and hard copy)
22 concerning communications and interactions between Quicken Loans team members
23 (employees) and clients that are maintained in the ordinary course of business. As
24 part of my duties at Quicken Loans, I am regularly called upon to identify, collect,
25 and review such available records.

26 6. I make this declaration based upon my personal knowledge and
27 experience, my review of Quicken Loans' non-privileged business records

1 concerning interactions between it and Hill maintained in the normal course of
2 Quicken Loans' business as part of its systems of record and available to me in the
3 regular course of my duties, and my review of the First Amended Complaint. The
4 information provided herein is true and correct to the best of my knowledge,
5 information, and belief.

6 7. Quicken Loans' records indicate that Hill took out a mortgage loan in
February 2017 from Quicken Loans in the amount of \$349,900 for the property
8 located at 35312 Frederick Street, Wildomar, California (the "Property").

9 8. Documents Hill submitted to Quicken Loans in connection with her
10 February 2017 loan application confirm that she is a veteran of the U.S. Navy.

11 9. Those business records also reflect that, on October 10, 2018, at
12 approximately 10:21 PM (PST), Quicken Loans received information from LMB
13 about Hill following the submission of contact and other personal information about
14 her, including a telephone number with the same last four digits as the one identified
15 in the First Amended Complaint, an email address, and a physical address in
16 Wildomar, California matching her Property address, to LMB as part of an inquiry
17 to obtain information about a mortgage loan refinance.

18 10. Based upon my review of Quicken Loans' business records, Quicken
19 Loans did not contact Plaintiff in October of 2018 until after it received her
20 information from LMB on October 10, 2018.

21 11. On November 12, 2018 at approximately 12:12 PM (PST), Quicken
22 Loans again received information about Hill from LMB based upon another inquiry
23 to obtain information about a mortgage loan refinance. This information included
24 the same contact and other personal information as that which Quicken Loans
25 received on October 10, 2018.

1 I declare under penalty of perjury under the laws of the United States of
2 America that the foregoing is true and correct.

3 Executed on April 15, 2019.

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5 PARUL LUTHRA

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